

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE PORK ANTITRUST  
LITIGATION

Civil No. 18-cv-01776 (JRT/JFD)

This Document Relates to: *All Actions*

**DECLARATION OF LINDSEY STRANG ABERG IN  
SUPPORT OF TYSON'S OPPOSITION TO PLAINTIFFS' MOTION FOR  
LETTERS OF ROGATORY FOR TYSON EMPLOYEE SUMIO MATSUMOTO**

LINDSEY STRANG ABERG, being duly sworn deposes and says:

1. I am over eighteen (18) years of age. I am an associate at Axinn, Veltrop & Harkrider LLP. I am admitted to this Court *pro hac vice*, and I represent Defendants Tyson Foods, Inc., Tyson Prepared Foods, Inc., and Tyson Fresh Meats, Inc. (collectively, along with other subsidiaries, “Tyson”). I submit this declaration based on my personal knowledge, my consultation with Tyson, and my review of pertinent records in support of Tyson’s Opposition to Plaintiffs’ Motion for Letters of Rogatory for Tyson Employee Sumio Matsumoto.

2. Sumio Matsumoto lives in Canada and is currently employed by a Canadian subsidiary of The Hillshire Brands Company, an entity not named as a Defendant in this litigation. Mr. Matsumoto has been living and working in Canada since June 2016. Prior to that, Mr. Matsumoto was working for Tyson as a Director of International Pork Sales, a position responsible for ex-U.S. sales of pork products, with a focus on sales to Japanese customers.

3. Mr. Matsumoto’s current direct supervisor is Jay Krehbiel, Tyson’s Senior Vice President of International Sales. Mr. Krehbiel is scheduled to be deposed in connection with this litigation on November 3, 2022. Mr. Matsumoto was previously directly supervised by Roel Andriessen, Tyson’s former Senior Vice President of International Sales. Mr. Andriessen is scheduled to be deposed in connection with this litigation on November 2, 2022.

4. Deborah McConnell, Tyson’s Associate Group Controller, was deposed in connection with this litigation on June 23, 2022.

5. Plaintiffs first emailed Tyson’s attorneys requesting to schedule the deposition of Mr. Matsumoto on September 9, 2022. On September 16, 2022, I responded to that email informing Plaintiffs that Mr. Matsumoto lives in Canada and is an employee of Hillshire Canada.

6. Tyson substantially completed its document productions on September 1, 2021. Pursuant to an agreement regarding “priority custodians,” Tyson completed its document production for Ms. McConnell on April 15, 2021. Tyson has made additional rolling productions after the “substantial completion” deadline (September 1, 2021), primarily in response to new search terms proposed by Direct-Action Plaintiffs as they are added to the case.

7. In support of this Opposition, Tyson submits the following:

<b>Ex.</b>	<b>Description</b>	<b>Filed Under Seal</b>
A	30(b)(1) Dep. Tr. Paul Peil, Dec. 9, 2021	X
B	30(b)(1) Dep. Tr. Ronald Freed, July 28, 2022	X
C	TF-P-000255324	X
D	30(b)(1) Dep. Tr. Noel White, May 13, 2022, Ex. 724	
E	Tyson Defendants’ Disclosures Pursuant to Order Regarding Disclosure of Information	
F	30(b)(1) Dep. Tr. Deborah McConnell, June 23, 2022	
G	30(b)(1) Dep. Tr. Shane Miller, May 26, 2022	
H	30(b)(1) (rough) Dep. Tr. Josh Edwards, Oct. 14, 2022	X
I	Email from L. Strang to J. Bourne, et al., Sep. 30, 2022	

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 20, 2022 in Washington D.C.

/s/ Lindsey Strang Aberg  
Lindsey Strang Aberg